

SECOND MOTION FOR EXTENSION OF TIME

1 **IT IS HEREBY STIPULATED** by and between Plaintiff, Dustin Neff (“Plaintiff”), and
2 Defendant, Goode Enterprise Solutions Inc. (“GES”), by and through their respective counsel, that
3 pursuant to Federal Rule of Civil Procedure 6(a), and Local Rule 6-1, GES may have to and
4 including August 31, 2023, to file a responsive pleading in this matter, as GES is investigating the
5 claims and is interested in engaging in settlement negotiations without the cost and expense of filing
6 a responsive pleading. GES’ counsel is also in the process of applying to appear Pro Hac Vice and
7 acquire local counsel in this matter. This does not alter the date of any event, or any deadline
8 already scheduled by the Court, and this is the second extension provided by Plaintiff.

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10 Date: July 31st, 2023.

Respectfully submitted,
/s/ Valerie A. Yanaros, Esq.
Valerie Yanaros, Esq.
Texas Bar No. 24075628
Applying to Appear Pro Hac Vice in
the Northern District Court of
California
Yanaros Law, P.C.
8300 Douglas Avenue Suite 800
Dallas, Texas 75225
Telephone: (512) 826-7553
valerie@yanaroslaw.com

17 **ATTORNEY FOR DEFENDANT GES**

18 /s/ Frank R. Trechsel, Esq.
Scott Alan Burroughs, Esq.
Frank R. Trechsel, Esq.
DONIGER/BURROUGHS

20 **ATTORNEYS FOR PLAINTIFF**

21 **ATTESTATION**

22
23 Concurrence in the filing of this document has been obtained from each of the individual(s) whose
24 electronic signature is attributed above.

25 By_ /s/ Valerie Yanaros _____
26 Valerie Yanaros
27 Attorney for Defendant,
28 Goode Enterprise Solutions, Inc.

1 **IT IS SO ORDERED,** Defendant, GES, shall have up to and including
2 August 31, 2023, to file a responsive pleading.

3 DATE: _____

4 _____
5 United States District Court Judge
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CERTIFICATE OF SERVICE

I hereby certify that on July 31st, 2023, the foregoing document was filed with the clerk of the court for the U.S. District Court, Northern District of California, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to all attorneys of record who have consented in writing to accept this Notice as service of documents by electronic means, including:

Scott Alan Burroughs (SBN 235718)
scott@donigerlawfirm.com

Frank R. Trechsel (SBN 312199)
ftrechsel@donigerlawfirm.com

DONIGER / BURROUGHS

603 Rose Avenue
Venice, California 90291
Telephone: (310) 590-1820
Attorneys for Plaintiff

/s/ Valerie Yanaros, Esq.
VALERIE YANAROS, ESQ.